

THE LAW OFFICE OF EDWARD A. MALDONADO, PA MALDONADO LAW GROUP

2850 South Douglas Road, Suite 303 Coral Gables, FL 33134 Tel: 305-477-7580 Fax: 305-477-7504 Direct Line 786-292-0459

www.maldonado-group.com

Edward A. Maldonado, Esq.: eam@maldonado-group.com

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<u>To</u>: Ms. Marlene Dortch, Secretary

Federal Communications Commission

Office of the Secretary 9300 East Hampton Drive Capitol Heights, MD 20743

In RE: CIMA Telecom, Inc. CALEA System Security and Integrity (SSI) Compliance Plan;

Docket No. 04-295

Dear Madame Secretary:

Attached redacted copy of the CALEA System Security and Integrity Compliance Plan, filed with the Commission on behalf of CIMA Telecom, Inc. This document updates the company's contact information and the policies and procedures the company uses to comply with the Communications Assistance for Law Enforcement Act pursuant to 47 C.F.R Part 1, Subpart Z, §1.20000 - 1.20008. CIMA Telecom, Inc.

CIMA Telecom, Inc. seeks confidential treatment for this submission pursuant to 47 C.F.R. § 0.459. The information submitted herein includes a description of policies and procedures for meeting the needs of law enforcement as well as personal employee contact information, and thus should be exempt from disclosure under 47 C.F.R. §§ 0.457(f)-(g). For similar reasons, the Commission has indicated in the past that it would not make information related to CALEA compliance routinely available to the public. Public knowledge of these procedures could interfere with enforcement efforts and public safety, as well as permit an unwarranted invasion of privacy of our employees.

CIMA Telecom, Inc. has not disclosed the information contained in this submission to the public at large,

and will disclose the information only on a limited basis to third parties, and only for the purpose of

assisting with lawfully ordered surveillance and information requests. Thus, the Commission should treat

this System Security and Integrity Plan as confidential. This Redacted Copy is thus given for public

disclosure with the original under seal with the Commission.

Please acknowledge receipt of this filing by date stamping the extra copy of this cover letter and returning

it to me in the self-addressed, stamped envelope provided. Any questions you may have pertaining to this

filing may be directed to me at eam@maldonado-group.com or 305-477-7580 Ext 214. Thank you.

Respectfully submitted on behalf of CIMA Telecom, Inc.

/s/\_\_Edward A. Maldonado\_\_\_/s/\_

3/27/19

Edward A. Maldonado, Esq.

Legal Counsel

Cc: file.

In the Matter of ET Docket No. 04-295 CIMA Telecom, Inc. SSI Plan

## CALEA SYSTEM SECURITY & INTEGRITY POLICIES AND PROCEDURES

## [PUBLIC REDACTED VERSION]

## CIMA TELECOM, INC.

FCC File No.: ITC-214-20010116-00020 FRN: 0007705916

Including its wholly owned and subsidiary

**AURIS, LLC** FRN: 0010003598

Enforce as of January 1, 2019

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- II. CALEA Policies & procedures for employee supervision and control
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    - iv. Reasonable Determination of Validity
  - D. Emergency Circumstances When No Court Order May Be Required
    - v. Interceptions of Communications (wiretaps)
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    - vii. Foreign Intelligence Surveillance Act
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  - K. Definitions

**Appendix A - SSI Representative Contact Information** 

Appendix B - Appointment of CALEA Compliance Manager

Appendix C - CIMA Telecom, Inc. Certification

Appendix D - Emergency Surveillance Request Form

Pages 3 to 27 are REDACTED from Public Inspection per 47 C.F.R. § 0.459